



1 I. NEEL CHATTERJEE (STATE BAR NO. 173985)  
nchatterjee@orrick.com  
2 THERESA A. SUTTON (STATE BAR NO. 211857)  
tsutton@orrick.com  
3 MORVARID METANAT (STATE BAR NO. 268228)  
mmetanat@orrick.com  
4 ORRICK, HERRINGTON & SUTCLIFFE LLP  
1000 Marsh Road  
5 Menlo Park, CA 94025  
Telephone: 650-614-7400  
6 Facsimile: 650-614-7401

7 Attorneys for Plaintiff  
FACEBOOK, INC.

8 UNITED STATES DISTRICT COURT  
9  
10 NORTHERN DISTRICT OF CALIFORNIA  
11  
12 SAN JOSE DIVISION

12 FACEBOOK, INC.,

13 Plaintiff,

14 v.

15 POWER VENTURES, INC. a Cayman Island  
16 Corporation; STEVE VACHANI, an  
individual; DOE 1, d/b/a POWER.COM,  
17 DOES 2-25, inclusive,

18 Defendants.

Case No. 5:08-cv-05780 JW (HRL)

**STIPULATION, PURSUANT TO  
CIVIL LOCAL RULE 6-2, TO  
ENLARGE TIME FOR FACEBOOK  
TO FILE DECLARATION IN  
SUPPORT OF MOTION TO SEAL  
EXHIBIT C TO FISHER  
DECLARATION (DKT. NO. 98)**

Judge: Hon. James Ware  
Courtroom: 8, 4th Floor

Plaintiff Facebook, Inc. and defendants Power Ventures, Inc.; Steve Vachani; and POWER.COM hereby stipulate, pursuant to Civil Local Rule 6-2, to an enlargement of time for Facebook, Inc. to file a declaration pursuant to Civil Local Rule 79-5(d). An enlargement of time is necessary and appropriate for the following reasons:

WHEREAS, on May 9, 2011, Defendant Power Ventures filed a Motion for Summary Judgment, which is set for hearing on September 19, 2011. Dkt. No. 98. In support of that motion, Power filed a motion to seal the deposition transcript of Craig Clark, in-house counsel at Facebook. *Id.*, Ex. C.

WHEREAS, Mr. Clark is currently out of the office (on his honeymoon), and unavailable to assist outside counsel in preparing a declaration pursuant to Civil L.R. 79-5(d).

WHEREAS, Mr. Clark plans to return to the office Tuesday, May 17, 2011.

NOW THEREFORE, subject to the approval of the Court, the parties hereby agree and stipulate that Facebook may file a declaration pursuant to Civil Local Rule 79-5(d) on or before Friday, May 20, 2011.

On July 27, 2009, the Court extended time for Facebook to respond to Defendants' counterclaims. Dkt. No. 48. On December 17, 2009, the Court continued the Case Management Conference. Dkt. No. 60. The requested modification will have no effect on the schedule for this case.

IT IS SO STIPULATED.

Dated: May 16, 2011

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ Theresa A. Sutton  
THERESA A. SUTTON  
Attorneys for Plaintiff  
FACEBOOK, INC.

1 Dated: May 16, 2011

BURSOR & FISHER, P.A.

2  
3 /s/ Timothy Fisher

4 TIMOTHY FISHER

Attorneys for Defendants

5 POWER VENTURES, INC.; STEVE VACHANI;  
and POWER.COM

6 **Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of  
7 perjury that concurrence in the filing of the document has been obtained from its signatory.

8  
9 Dated: May 16, 2011

Respectfully submitted,

10 /s/ Theresa A. Sutton

11 THERESA A. SUTON

12 PURSUANT TO STIPULATION, IT IS SO ORDERED:

13  
14 Facebook shall file a declaration pursuant to Civil Local Rule 79-5(d) on or before Friday,  
15 May 20, 2011.

16 DATED: June 2, 2011

17   
JAMES WARE

18 United States District Judge  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28